

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GENERIC DIGOXIN AND  
DOXYCYCLINE ANTITRUST  
LITIGATION**

**MDL NO. 2724  
16-MD-2724**

**HON. CYNTHIA M. RUFÉ**

**THIS DOCUMENT RELATES TO:  
  
DIRECT PURCHASER ACTIONS**

**CERTAIN DEFENDANTS' MOTION TO DISMISS DIRECT PURCHASER  
PLAINTIFFS' CONSOLIDATED AMENDED CLASS ACTION COMPLAINT**

Pursuant to Fed. R. Civ. P. 12(b)(6), defendants Actavis Holdco U.S., Inc., Lannett Company, Inc., Impax Laboratories, Inc., Mayne Pharma Inc., Mylan Pharmaceuticals, Inc., Par Pharmaceutical, Inc., Sun Pharmaceutical Industries, Inc., and West-Ward Pharmaceuticals Corp. (collectively, "Defendants") hereby move to dismiss the Direct Purchaser Plaintiffs' Consolidated Amended Class Action Complaint (Dkt. No. 125) in the above-captioned action. In support of this Motion, Defendants rely upon Certain Defendants' Memorandum of Law in Support of Joint Motion to Dismiss Direct Purchaser Plaintiffs' Consolidated Amended Class Action Complaint and all exhibits and attachments thereto, which are being filed contemporaneously with this Motion.

For all of the reasons set forth therein, the Direct Purchaser Plaintiffs' Consolidated Amended Class Action Complaint should be dismissed in its entirety.

Respectfully submitted,

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